

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ANTONIO DOSANJOS and
SIMEON MIONGO,

Plaintiffs,

v.

MULTIBAND FIELD SERVICES, INC.

Defendant.

Civil Action No.: 1:15-CV-10592

JOINT STATEMENT PURSUANT TO LOCAL RULE 16.1(D)

The parties submit this Joint Statement Regarding Pretrial Schedule pursuant to Local Rule 16.1 of the United States District Court for the District of Massachusetts and the Court's Notice of Scheduling Conference.

PROPOSED PRETRIAL SCHEDULE AND DISCOVERY PLAN

The parties agree and request that the Court approve the following Proposed Pretrial Schedule and Discovery Plan, as set forth in the attached draft Scheduling Order:

October 5, 2015	Deadline for completion of all fact discovery, including requests for production of documents, interrogatories and fact witness depositions. The parties will provide initial disclosures in accordance with Fed. R. Civ. P. 26(a)(1) within fourteen days of the scheduling conference on April 6, 2015. The parties have conferred regarding the obligation to limit discovery pursuant to Fed. R. Civ. P. 26(b). The parties do not believe that this case will involve electronic information. Parties agree to preserve and disclose any electronic information to the extent that it is discovered in the process of this litigation.
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November 7, 2015	Deadline for serving dispositive motions, if either party determines that such a motion is appropriate.
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December 7, 2015 Opposition to any dispositive motions filed

60 days after a ruling on any dispositive motions:

Expert Witness Disclosure by Plaintiff.

105 days after a ruling on any dispositive motions:

Expert Witness Disclosure by Defendant.

150 days after a ruling on any dispositive motions:

Discovery of Expert Witnesses Completed

Further events, such as a pre-trial conference and trial, to be scheduled at the Court's convenience.

The parties understand and agree that this discovery schedule assumes the cooperation of the parties, and all third party witnesses. The parties further agree that requests for additional time for discovery may be made and shall be reasonably agreed to in the event of delays occasioned by discovery disputes requiring a decision by the Court, and/or the availability of witnesses due to vacation or work schedules.

CERTIFICATIONS

The parties will submit any certifications required by Local Rule 16.1(D)(3).

WHEREFORE, Plaintiff and Defendants respectfully request that the Court approve their Proposed Pretrial Schedule and Discovery Plan, with such amendments as the Court deems just and proper.

Respectfully submitted,

Plaintiffs,
By their attorney,

/s/ Maria Mancini Scott
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Defendant,
By its attorneys,

/s/ Christopher J. Campbell
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DATE: April 1, 2015

CERTIFICATE OF SERVICE

I hereby certify that this document was filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing on April 1, 2015 and by first class U.S. mail, postage pre-paid to any non-registered participants.

/s/ Christopher J. Campbell
Christopher J. Campbell